



Commonwealth of Massachusetts

Division of Fisheries & Wildlife

MassWildlife

Wayne F. MacCallum, *Director*

January 29, 2009

Ian A. Bowles, Secretary of Energy and Environmental Affairs
Attn: Elizabeth Sorenson, ACEC Program
Department Of Conservation and Recreation
251 Causeway Street, Suite 700
Boston, MA. 02114

Dear Secretary Bowles:

The Massachusetts Division of Fisheries and Wildlife (the Division) and its Board strongly supports the nomination to designate the Upper Housatonic River, covering approximately 12,280 acres including 13 miles of the Housatonic River extending from the confluence of the East and West Branches downstream to Lee, as an Area of Critical Environmental Concern (ACEC). The proposed area is the quintessential definition of an ACEC. The upper Housatonic River embodies most, if not all of the features and criteria for designation as outlined below.

To be designated as an ACEC, an area must contain at least 4 of the 11 eleven ecosystem features specified in the ACEC regulations including such features as fishery habitat; inland wetlands; inland surface waters; natural hazard areas such as floodplains; habitat resources for state-listed species under Massachusetts Endangered Species Act ("MESA"); and special use areas such as public recreational or natural areas. The criteria for designating an ACEC includes the quality of natural characteristics; productivity of the area as a food source for or hosting a high diversity of finfish, shellfish, waterfowl, wildlife, or other biota; uniqueness of the area; and other supporting factors such as a strong public consensus on the intrinsic value of the area and ownership of some or all of the resource by the local, state, or federal government.

The Housatonic River watershed is one of the most biologically rich and unique regions of the Commonwealth supporting one of the highest densities of state-listed species in the state. The proposed ACEC encompasses a unique natural system with an abundance of diverse and ecologically sensitive fisheries and wildlife resources including 31 state-listed species under the Massachusetts Endangered Species Act (MESA). In addition to the state-listed species, there are two certified vernal pools, another possible 44 vernal pools, six exemplary natural communities, and coldwater fisheries resources, including the main stem Housatonic River and numerous direct coldwater tributaries within the proposed ACEC boundaries; all of which are of conservation concern.

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Division of Fisheries and Wildlife

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As such, the Division has invested substantial resources on behalf of the Commonwealth to protect open space as habitat for fish and wildlife in the Housatonic watershed. The Division has been acquiring property in the upper Housatonic River area over the past several decades to protect this unique natural system and its wildlife resources and is one of the single largest land owners along the Housatonic River in the Commonwealth. The George Darey Wildlife Management Area (the "Darey WMA") is owned and managed by the Division for biological diversity and wildlife-dependent outdoor recreation. The Darey WMA is located within the proposed ACEC includes approximately 818 acres spread across multiple parcels consisting largely of floodplain and river-front lands (this includes approximately 85% of the land along river's bank on one or both sides of the river from the confluence downstream to Woods Pond in Lenox, MA). The Darey WMA is one of western Massachusetts' most heavily utilized wildlife management areas for all types of passive recreation including hunting, fishing, trapping, hiking, canoeing, kayaking, bird watching, and wildlife viewing. Wildlife-dependent outdoor recreation has significant and far-reaching benefits to the economy of the surrounding region.

In summary, the Upper Housatonic River is undisputedly a unique natural system supporting a vast array of species and habitats as well as providing countless hours of all types of passive wildlife-dependent outdoor recreation. Clearly, this area meets the criteria for designation including its substantial biodiversity and habitat for state-listed species, exemplary natural community types, coldwater fisheries resources, waterfowl habitat, and ownership of some or all the resource area (i.e., the George Darey Wildlife Management Area and October Mountain State Forest).

Very truly yours,

Wayne F. MacCallum
Director

Cc: Mary B. Griffin, Commissioner, DFG